

# Technical Memorandum

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**TO:** Dennis Osborn, Planner, City of Everett  
**CC:** Laura Gurley, City of Everett  
Jeff Becker, KPFF Consulting Engineers  
**FROM:** Steven Quarterman  
**DATE:** July 27, 2021  
**RE:** Viewshed Analysis  
Maritime Industrial Expansion Project  
Port of Everett  
Everett, Washington  
Project No. 0121049.030

## Introduction

The Port of Everett (Port) is proposing the Maritime Industrial Expansion (MIE) project (Project; Site) at the former Kimberly-Clark Worldwide (K-C) mill site (K-C Site). The Project includes integration of the 3<sup>rd</sup> Interim Action<sup>1</sup> for the K-C Site and development of the Norton Terminal into a secure marine cargo terminal on approximately 34 acres of the Site.

As part of Norton Terminal, lighting will be provided by LED light clusters mounted on 15 high-mast poles set on concrete protective foundations. The main terminal lighting system will generally be arranged in three rows of poles running from north to south (Attachment 1). The high-mast light poles will be 75 feet (ft) tall and spaced approximately 300 ft apart.

The height of the high-mast lights exceeds the height limit in the Heavy Industrial (HI) zoning classification, as referenced in the City of Everett's Municipal Code (EMC 19.22.020). The height limit at the Site is identified as 5 stories, and EMC 19.22.060(E)(1)(a) identifies floor or story heights in the industrial zone as 15 ft for the first floor and 10 ft for upper floors (i.e., 55 ft for a 5-story building). Therefore, the proposed high-mast light poles, at 75 ft in height, are the equivalent of 7 stories. As a result, the Port is seeking exception to the height limits to accommodate the proposed high-mast light poles in accordance with EMC Chapter 19.22.070 (Exception for heights in industrial zones), which allows for approval of an addition of 2 floors (i.e., 20 ft in height) in the industrial zone along the waterfront.

Landau Associates, Inc. (LAI) under contract to KPFF Consulting Engineers (KPFF), has prepared this technical memorandum to provide viewshed analysis in compliance with EMC 19.22.070(A) for industrial zones along waterfront.

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<sup>1</sup> Interim cleanup action under the Model Toxics Control Act (MTCA).

## Viewshed Analysis

The following review criteria (in bold) were copied from EMC 19.22.070 (A), which identifies criteria in support of an exception to the applicable height restrictions in industrial areas along the waterfront and approval of two additional floors (i.e., and associated height).

**1. The increased height is necessary to support water-dependent industrial activities on the property.**

The proposed use as a cargo terminal is a “water-dependent use,” as defined in the City of Everett’s Shoreline Master Program, which references ship cargo terminal loading areas. The proposed high-mast light poles are required to support operations, meet security requirements, and provide required illumination at the cargo terminal, specifically the taller pole height provides for greater extent of illumination from each pole, which minimizes the number of light poles that would otherwise conflict with cargo storage/movement on the Site.

**2. The increased height will not obstruct the view of a substantial number of residences for those areas adjoining the shoreline.**

Permanent placement of the high-mast light poles may interfere with, but not obstruct, a small percentage of the broad expanse of water, mountain, island, and peninsula views from public streets, sidewalks, and nearby residential areas located to the east of the Site. These views include Port Gardner Bay; Possession Sound and adjacent waters; Whidbey, Jetty, Hat, and Camano Islands; the Olympic Peninsula and Olympic Mountains; Naval Station Everett; and the Tulalip Reservation. However, the proposed light poles will be thin (i.e., base diameter of 17 inches tapering to a diameter of approximately 7 inches at the top with mast head light array extending radially from the top of the high-mast pole; refer to Attachment 1), singular poles that will maintain most of the existing views of these very small portions of the total view areas. The Site sits on average approximately 15 ft below West Marine View Drive. Elevations increase further to the east allowing for views across the Site to the US Navy base and beyond.

Photographs are provided in Attachment 2 that show views from the terminus of 24<sup>th</sup> Street (see Attachment 2, Figure 2-1) showing views of:

- When the K-C mill was in operation (see Attachment 2, Figure 2-2);
- Current conditions (i.e., following completion of the 2<sup>nd</sup> Interim Action; see Attachment 2, Figure 2-3); and
- A rendering with the proposed high-mast light poles (see Attachment 2, Figure 2-4).

The former K-C Site substantially obstructed shoreline views, and the Project will maintain views of the shoreline similar to that of the current conditions. The existing viewshed includes other standard height poles (e.g., streetlights on West Marine View Drive and overhead utilities along the railroad tracks) that are much closer to the east side of the Site. Further to the west and within the existing viewshed are several tall utility poles, including high-mast light poles throughout the US Navy base, some of which appear to be of similar height as those proposed by the Port, and numerous Snohomish County PUD power poles both along the shoreline and closer to Lower Norton that are 80 ft tall.

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**3. The increased height will not cause adverse impact on views from adjoining public parks or public open spaces.**

No parks or public open spaces directly adjoin the Site. The Bayside Park and Bayside P-Patch are located at the corner of 23<sup>rd</sup> Street and Marine View Drive, northeast of the Site, and are separated from the Site by BNSF Railway rail right-of-way and West Marine View Drive (see Attachment 2, Figure 2-1). Nonetheless, views from the park and P-patch will not be adversely affected by the proposed high-mast light poles. Views would be similar to those experienced by the residences discussed above and would be improved from the previous condition when the K-C mill was in operation.

## Conclusion

The proposed high-mast light poles associated with Norton Terminal will exceed current standard zoning height requirements; however, the high-mast light poles are within the allowed height exception criteria as specified in EMC 19.22.070 (A). The high-mast lighting is required to support operation of the water-dependent activities at Norton Terminal, will not significantly impact views from adjacent properties, and will maintain the significantly improved views of the shoreline achieved since the demolition of the K-C mill structures.

LANDAU ASSOCIATES, INC.



Steven Quarterman  
Senior Associate

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Attachments: Attachment 1 – High-Mast Lighting Plan and Details  
Attachment 2 – Viewshed Perspectives

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# High-Mast Lighting Plan and Details





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## **Viewshed Perspectives**

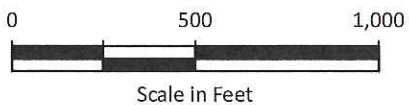


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#### Legend

- Viewshed Ground Level Perspective
- Location Reference Point
- Bayside Park and P-Patch
- Project Area



#### Notes

- 1 Refer to Figure 2-2 through 2-4 for ground level perspective of previous, current, and proposed conditions.
2. Black and white reproduction of this color original may reduce its effectiveness and lead to incorrect interpretation.

Data Source: Snohomish County GIS.



Marine Industrial Expansion  
Port of Everett  
Everett, Washington

### Viewshed Location Map

Figure  
**2-1**

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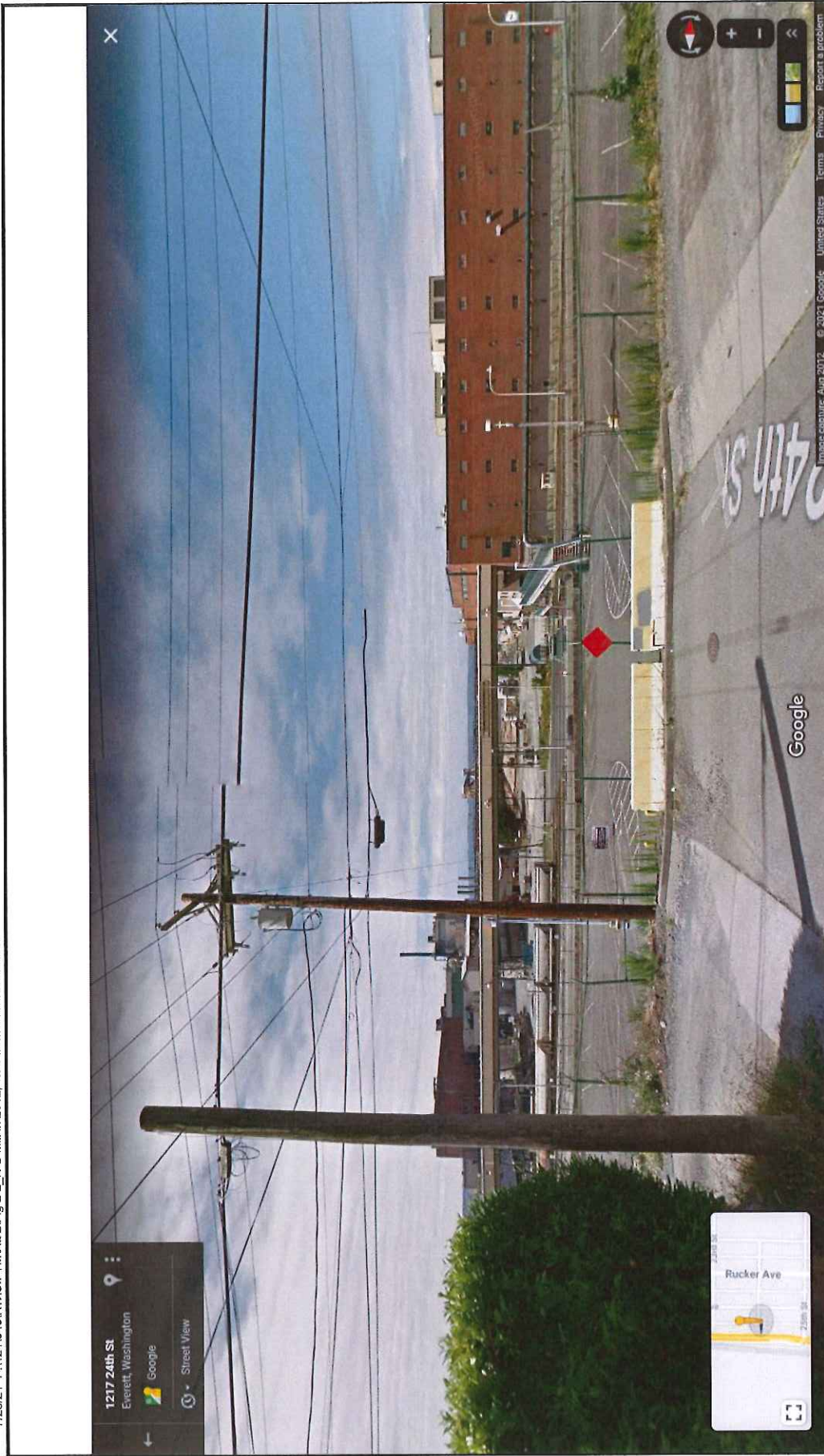


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Marine Industrial Expansion  
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Figure  
2-2

K-C Mill in 2012, View from 24<sup>th</sup> Street



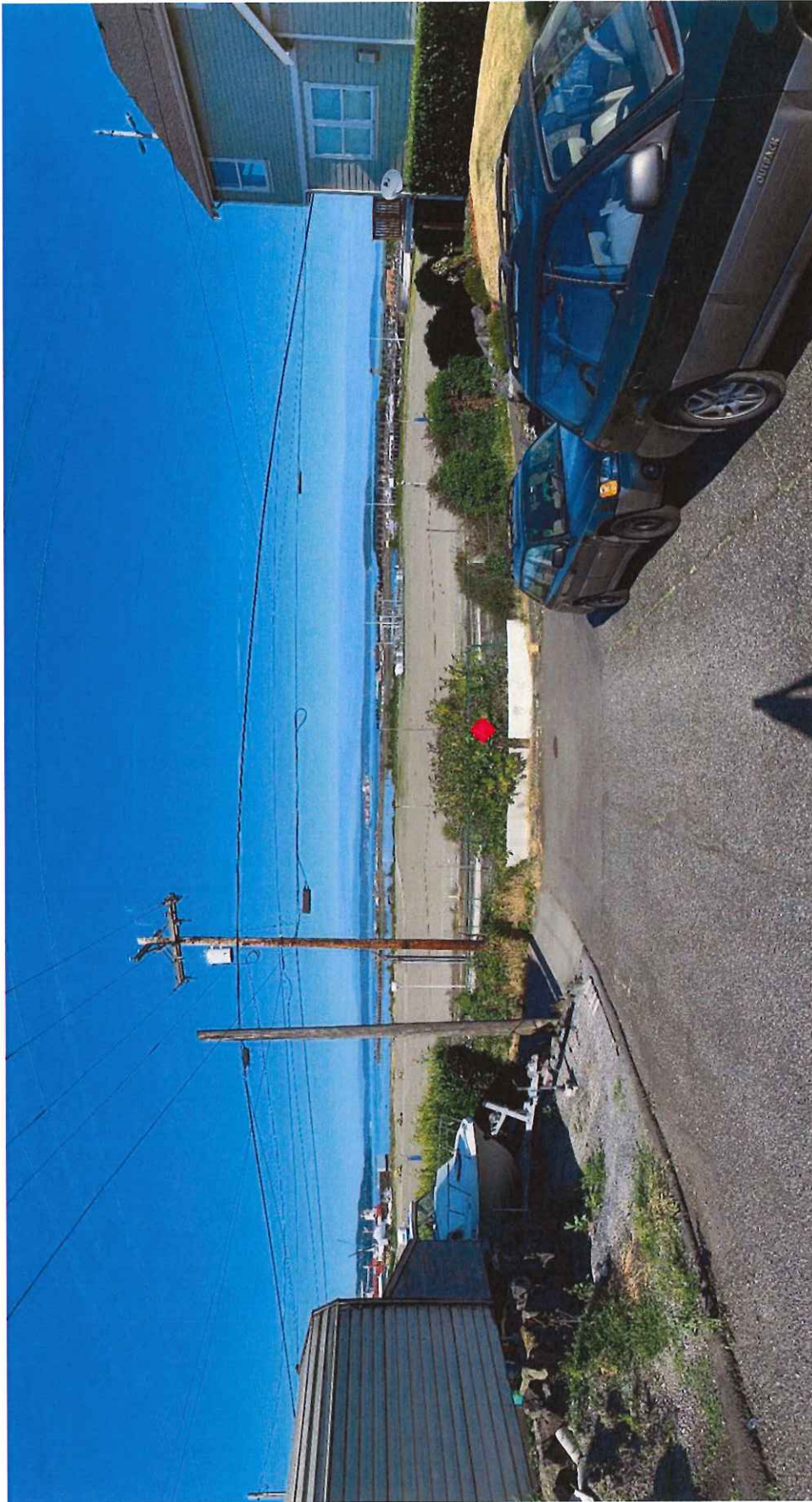


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Figure  
2-3

Current Condition July 2021, View  
from 24<sup>th</sup> Street

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**LA** LANDAU  
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Legend

Proposed 75-ft High-Mast Light Pole

Note

1. Black and white reproduction of this color original may reduce its effectiveness and lead to incorrect interpretation.

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Source: Port of Everett / KPFF, 2021

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Rendering of Viewshed  
With 75-ft High-Mast Light Poles

Figure  
2-4

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